



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

claring and limiting particular phases of the use of the phonograph. Bench and Bar, referring to the weight of the evidence received in the Michigan court, observes that "we doubt the adequacy of the comparatively faint voice of a phonograph to reproduce the full effect of a railroad train steaming along a street." There is, of course, point to this remark. It would seem, however, that the evidence was competent for what it was worth, and the question of adequacy or inadequacy of representation was one for argument and perhaps for additional testimony.

Husband and Wife—Actions Between on Tort or Contract.—In *Heyman v. Heyman*, in the Court of Appeals of Georgia (April, 1917, 92 S. E. 25), the actual decision, according to the syllabus by the court, was that "under the statute law of Georgia a wife cannot recover of a husband, with whom she is living in lawful wedlock, for a tort resulting from his negligent operation of an automobile in which they were riding at the time of the injury." The decision is of interest because after an examination and comparison of Married Women's Enabling Acts and decisions of the courts of various states interpreting them, the general proposition is laid down that a wife has no right to sue for husband for a tort committed by him. This question has been passed upon by the courts of many states, and we cannot say what the numerical preponderance of authority is one way or the other. The Supreme Court of Errors of Connecticut in *Brown v. Brown* (89 Atl. 889), holds that under the Married Women's Act of that state a wife might maintain an action for false imprisonment and assault against her husband. The Supreme Court of the United States in *Thompson v. Thompson* (218 U. S. 611), Justices Harlan, Holmes and Hughes dissenting, had chosen the ultra-conservative view holding that such an action would not lie.

The Michigan Law Review for May, 1917, contains the following editorial note:

"Husband and Wife—Contract for Services Rendered Husband.—The husband had hired the plaintiff, his wife, to assist him in his work as a detective, agreeing to pay her what her services were reasonably worth. The statute provided that a married woman might contract with reference to her property in the same manner and to the same extent as a married man and that she should be entitled to her earnings. She sued to recover from husband's estate the value of her services to him. Held that a married woman under an express contract with her husband may recover for extra or unusual services rendered him (*In re Cormick's Estate*, Neb., 1916, 160 N. W. 989).

The authorities are inconsiderable conflict upon the point raised in the instant case. Under most married women's statutes the wife is entitled to her earnings in her separate business or when she is